

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Marvin Fleming, et al. v. National Football
League, et al.

Court File No. 2:13-cv-00051-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS LAWRENCE
SAMPLETON, JR. AND
EDYTHE SAMPLETON**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Lawrence Sampleton, Jr. and Edythe Sampleton only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Marvin Fleming, et al. v. National Football League, et al.*, No. 12-cv-09270, in the Southern District of New York on December 19, 2012 and it was transferred and assigned Court File No. 2:13-cv-00051-AB, in the Eastern District of Pennsylvania on January 4, 2013, for the benefit of several retired National Football League players, including Lawrence Sampleton, Jr. and Edythe Sampleton.

2. Plaintiffs' counsel filed a short form complaint for Lawrence Sampleton, Jr. and Edythe Sampleton on January 10, 2013.

3. Since then, irreconcilable differences have arisen between Plaintiffs Lawrence Sampleton, Jr. and Edythe Sampleton and the undersigned.

4. Plaintiffs' counsel properly notified Lawrence Sampleton, Jr. and Edythe Sampleton of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Lawrence Sampleton, Jr. and Edythe Sampleton only in Court File No. 13-cv-00051-AB.

Dated: February 9, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman
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